

EPSTEIN
BECKER
GREEN

Attorneys at Law

Robert M. Travisano
t 973.639.8289
f 973.642.0099
rtravisano@ebglaw.com

July 10, 2015

VIA ECF AND EMAIL

Hon. Katherine Polk Failla, U.S.D.J.
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: Meritage Data Inc. v. MD Insider, Inc.
Civil Case No. 15-cv-3610

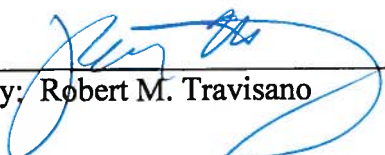
Dear Judge Polk Failla:

Your Chambers asked that the parties advise the Court of their progress in agreeing to a Consent Order regarding arbitration or, alternatively, whether Plaintiff intends to oppose Defendant's motion to compel arbitration. Counsel have exchanged several rounds of comments to a draft Consent Order, but have not yet reached an accord. Moreover, progress has been somewhat delayed due to the fact that Mr. Sadler has been on trial the past week.

In light of the foregoing, we respectfully request a brief extension, until Wednesday, July 15, 2015, to either submit the Consent Order for Your Honor's consideration, or advise the Court whether Plaintiff will oppose Defendant's motion to compel arbitration.

We thank the Court in advance for its consideration.

Respectfully submitted,
EPSTEIN, BECKER & GREEN, P.C.

By: 
Robert M. Travisano

RMT:lnd
cc: Kevin Sadler, Esq. (via ECF)